

**DEPARTMENT OF HEALTH SERVICES
BUREAU OF EMERGENCY MEDICAL SERVICES**

**SUBSTANTIVE POLICY STATEMENT
#SP-078-PHS-EMS**

**Interpretation of “act as an EMT-B, EMT-I, or EMT-P” in A.A.C. R9-25-401(A),
as Applied to a Student Enrolled in a Course**

This substantive policy statement is advisory only. A substantive policy statement does not include internal procedural documents that only affect the internal procedures of the agency and does not impose additional requirements or penalties on regulated parties or include confidential information or rules made in accordance with the Arizona Administrative Procedure Act. If you believe that this substantive policy statement does impose additional requirements or penalties on regulated parties, you may petition the agency under Arizona Revised Statutes § 41-1033 for a review of the statement.

The purpose of this substantive policy statement is to notify the public how the Arizona Department of Health Services (ADHS) interprets the language “act as an EMT-B, EMT-I, or EMT-P” in A.A.C. R9-25-401(A), as applied to a student enrolled in a course, as defined in A.A.C. R9-25-301.

A.A.C. R9-25-401(A) provides that “[a]n individual shall not act as an EMT-B, EMT-I, or EMT-P unless the individual has current certification or recertification from the Department.” The rule does not address whether or how it applies to a student enrolled in a course, as defined in A.A.C. R9-25-301.

ADHS believes that it is essential that each student enrolled in a course that includes requirements for clinical training and/or field training, as defined in A.A.C. R9-25-101, be able to complete those requirements to attain the competencies necessary to succeed. ADHS also believes that the requirements in A.A.C. R9-25-304 for supervision by a qualified preceptor during clinical training and field training provide the necessary safeguards to ensure that public health and safety are not compromised during clinical training and field training. ADHS also recognizes that interpreting the language “act as an EMT-B, EMT-I, or EMT-P” in A.A.C. R9-25-401(A) to apply to a student enrolled in a course would result in preventing that student from attaining new skills through clinical training and field training if the skills being taught exceeded the student’s current scope of practice, which they almost always would.

In light of this, ADHS interprets the language “act as an EMT-B, EMT-I, or EMT-P” in A.A.C. R9-25-401(A) not to apply to a student enrolled in a course, as defined in A.A.C. R9-25-301, while the student is participating in clinical training and field training under the supervision of a qualified preceptor as required under A.A.C. R9-25-304.

***Effective June 1, 2006
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